

Laura Vartain Horn (SBN 258485)  
**KIRKLAND & ELLIS LLP**  
555 California Street, Suite 2700  
San Francisco, CA 94104  
Telephone: (415) 439-1625  
laura.vartain@kirkland.com

Allison M. Brown (Admitted *Pro Hac Vice*)  
**KIRKLAND & ELLIS LLP**  
2005 Market Street, Suite 1000  
Philadelphia, PA 19103  
Telephone: (215) 268-5000  
alli.brown@kirkland.com

Jessica Davidson (Admitted *Pro Hac Vice*)  
**KIRKLAND & ELLIS LLP**  
601 Lexington Avenue  
New York, NY 10022  
Telephone: (212) 446-4800  
jessica.davidson@kirkland.com

Kim Bueno (Admitted *Pro Hac Vice*)  
**KIRKLAND & ELLIS LLP**  
401 W. 4<sup>th</sup> Street, Austin, TX 78701  
Telephone: (512) 355-4390  
kim.bueno@kirkland.com

*Attorneys for Defendants*  
UBER TECHNOLOGIES, INC., RASIER, LLC,  
And RASIER-CA, LLC

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION

\_\_\_\_\_  
This Document Relates to:

*Jaylynn Dean v. Uber Techs., Inc.*,  
No. 23-cv-06708

Case No. 3:23-md-03084-CRB (LJC)

**DECLARATION OF LAURA VARTAIN  
HORN IN SUPPORT OF DEFENDANTS  
UBER TECHNOLOGIES, INC., RASIER,  
LLC, AND RASIER-CA, LLC'S  
OPPOSITION TO PLAINTIFF'S OMNIBUS  
MOTIONS IN LIMINE**

Judge: Hon. Charles R. Breyer  
Courtroom: 6 – 17th Floor

\_\_\_\_\_  
DECLARATION OF LAURA VARTAIN HORN ISO DEFENDANTS' OPPOSITION TO  
PLAINTIFF'S OMNIBUS MOTIONS IN LIMINE

Case No. 3:23-md-03084-CRB (LJC)



1 I, Laura Vartain Horn, declare as follows:

2 1. I am an attorney at law duly admitted to practice before the courts of the State of California  
3 and a partner with the law firm of Kirkland & Ellis LLP, counsel of record for Defendants Uber  
4 Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC (collectively, “Uber”) in this action. I have personal  
5 knowledge of each and all of the facts stated in this declaration and, if called as a witness, could and would  
6 competently testify to the facts contained herein.

7 2. Attached hereto as **Exhibit 1** is a true and correct copy of the Order On Parties’ Motions  
8 In Limine and Motions to Exclude Expert Opinions, dated August 29, 2025, and filed in Case No. CJC-  
9 21-005188.

10 3. Attached hereto as **Exhibit 2** is a true and correct copy of the Tempe Police Department  
11 General Offense Report, produced in this case at Bates BW-DEAN\_JAYLYNN\_000024.

12 4. Attached hereto as **Exhibit 3** is a true and correct copy of excerpts from the transcript of  
13 the deposition of Jaylynn Dean, taken on June 27, 2025.

14 5. Attached hereto as **Exhibit 4** is a true and correct copy of excerpts from the transcript of  
15 the deposition of Mindy Mechanic, taken on November 11, 2025.

16 6. Attached hereto as **Exhibit 5** is a true and correct copy of excerpts from the transcript of  
17 the deposition of Natasha Ramos, taken June 26, 2025.

18 7. Attached hereto as **Exhibit 6** is a true and correct copy of excerpts from the transcript of  
19 the deposition of Olajuwon Ramos, taken June 26, 2025.

20 8. Attached hereto as **Exhibit 7** is a true and correct copy of Exhibit 3 from the deposition of  
21 Natasha Ramos, taken June 26, 2025.

22 9. Attached hereto as **Exhibit 8** is a true and correct copy of excerpts from the transcript of  
23 the deposition of Mindy Mechanic, taken on November 23, 2025.

24 10. Attached hereto as **Exhibit 9** is a true and correct copy of Exhibit 1989 from the deposition  
25 of Greg Brown, taken on August 26, 2025.

26 11. Attached hereto as **Exhibit 10** is a true and correct copy of excerpts from the transcript of  
27 the deposition of Greg Brown, taken on August 26, 2025.



12. Attached hereto as **Exhibit 11** is a true and correct copy of UBER-MDL3084-BW-00054160.

13. Attached hereto as **Exhibit 12** is a true and correct copy the transcript of the deposition of Greg Brown, taken on July 15, 2025.

14. Attached hereto as **Exhibit 13** is a true and correct copy the transcript of the deposition of Hassan Turay, taken on July 23, 2025.

15. Attached hereto as **Exhibit 14** is a true and correct copy the transcript of the deposition of Sachin Kansal, taken on May 28, 2025.

16. Attached hereto as **Exhibit 15** is a true and correct copy the transcript of the deposition of Henry (Gus) Fuldner, taken on April 29, 2025.

17. Attached hereto as **Exhibit 16** is a true and correct copy the transcript of the deposition of Emilie Boman, taken on October 1, 2025.

18. Attached hereto as **Exhibit 17** is a true and correct copy the transcript of the deposition of Rebecca Payne, taken on April 2, 2025.

19. Attached hereto as **Exhibit 18** is a true and correct copy the transcript of the deposition of Nairi Hourdajian, taken on February 7, 2025.

20. Attached hereto as **Exhibit 19** is a true and correct copy the transcript of the deposition of Mariana Esteves, taken on August 28, 2025.

21. Attached hereto as **Exhibit 20** is a true and correct copy the transcript of the deposition of Hannah Nilles, taken on June 30, 2025.

22. Attached hereto as **Exhibit 21** is a true and correct copy the transcript of the deposition of Dr. Henry (Gus) Fuldner, taken on March 27, 2025.



1 I declare under penalty of perjury under the laws of the United States and the State of California  
2 that the foregoing is true and correct.

3 Executed on December 30, 2025, in San Francisco, California.

4 /s/ Laura Vartain Horn

5 *Laura Vartain Horn*  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27